

**REMARKS**

Claims 42, 45-55, 57, 59-67, 69, 72-81, 83 and 85 stand rejected, of which claims 81, 83 and 85 are independent. The Applicants respectfully request reconsideration in view of the following remarks. No new matter is introduced.

***Claim Rejections – 35 U.S.C. § 103***

Claims 42, 45-55, 57, 59-67, 69, 72-81, 83 and 85 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Du et al (U.S. Patent 6,041,306) in view of Buzaki (U.S. Patent 5,987,422), Gadol (U.S. Patent 5,754,857) in further view of alleged “admitted prior art.”

The invention as recited in claims 81, 31 and 85 involves multiple activity servers that together process a workflow using workflow transition information obtained from a common database. During operation, an activity server retrieves a workflow packet from a common workflow queue and performs the activity identified in the workflow packet as well as each subsequent activity identified in the workflow transition information until it cannot perform the next activity. Once the activity server determines that it is incapable of performing the next activity, the server forms a new workflow packet and forwards it back to the workflow queue so that another activity server can retrieve and perform at least the next activity within the workflow. Accordingly, the claimed invention enables performance of a workflow process by multiple activity servers, reducing database contention and single points of failure associated with prior art workflow systems. Support for claims 81, 83 and 85 as previously presented can be found at least in FIGS. 3, 4 and the specification as originally filed on page 10, line 22 to page 11, line 13, page 13, line 11 to page 15, line 10, page 16, line 4 to page 19, line 14. We disagree with the Examiner that the combination of Du, Buzaki and Gadol render the claimed invention obvious.

Du is directed to a workflow system in which a centralized resource manager itself allocates individual tasks defined in a workflow queue to appropriate activity servers. (Du et al: FIGS. 2, 4; col. 5, lines 44-58; col. 6, lines 1-6; col. 18, lines 27-47; col. 7, lines 35-44; col. 19, lines 19-45). Thus, the system of Du et al is similar to the prior art that is distinguished in FIG. 2 of the present application. In FIG. 2, Applicants distinguish the claimed invention from a resource manager 21 that retrieves activities from a database 12 and allocates such activities to appropriate activity servers 11. As discussed, such a system may reduce contention to the

database 12 because only the resource manager 21 lock the database 21. However, the resource manager 21 itself is a single point of failure and may become a performance bottleneck. See specification as originally filed on page 3, lines 8-14. In contrast, with respect to the claimed invention, each of the activity servers is able to access the workflow queue, thereby avoiding a single point of failure. Furthermore, since each activity server continues to perform the sequence of activities until it cannot perform the next activity, contention to the database created by the activity servers accessing the database is reduced.

Buzsaki (U.S. Patent 5,987,422) does not disclose an automated method for processing a workflow among a plurality of activity servers at all. Rather, Buzsaki is directed at a particular problem in which a workflow is blocked pending the receipt of required input. In such instances, Buzsaki stores the current state of the workflow and allows other non-blocked workflows to continue. Once the required input is received, the blocked workflow continues. (See Buzsaki: FIG. 7, Abstract).

Newly cited Gadol does not correct the deficiencies of Du, Buzsaki or the allegedly admitted prior art. Rather, Gadol is similar to Du in that it acts as a centralized resource manager which pre-allocates individual tasks defined in a workflow queue to appropriate clients. Specifically, Gadol discusses a workflow system in which a central database server generates a so-called "workflow courier" that pre-defines all of the stages of the requested workflow and assigns each stage to a particular client to process. After a client completes a stage, the client then updates the workflow courier to indicate the current state of the workflow and forwards the updated workflow courier directly to the next client identified in the workflow courier to handle the next stage of the workflow. Accordingly, as acknowledged by the Examiner in the Interview Summary dated May 26, 2009, Gadol fails to disclose at least the feature "wherein the next activity is incapable of being performed by the activity server, forming the next workflow packet corresponding to the next activity and forwarding the next workflow packet to the workflow queue for retrieval by another activity server capable of performing the next activity" as recited in claims 81, 38 and 85.

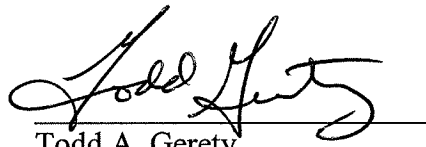
For at least these reasons, claims 81, 83 and 85 are patentable as they are neither anticipated nor obvious in view of the prior art of record.

Furthermore, by virtue of at least their dependency upon claims 81, 83 and 85, respectively and the additional features recited therein, the claim 42, 45-55, 57, 59-67, 69, 72-80 are also patentable.

**CONCLUSION**

In view of the above amendments and remarks, it is believed that claims 42, 45-55, 57, 59-67, 69, 72-81, 83 and 85 are in condition for allowance, and it is respectfully requested that the application be passed to issue. If the Examiner feels that a telephone conference would expedite prosecution of this case, the Examiner is invited to call the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Todd Gerety", is written over a horizontal line.

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